

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Thomas et al.)	
)	
Plaintiffs,)	
v.)	
)	
Andino et al.)	
)	
)	CASE NO. No 3:20-cv-01552
Defendants.)	

DECLARATION OF WILLIAM S. COOPER

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. §1746, 26(a)(2)(B), the Federal Rules of Civil Procedure, and Rules 702 and 703, the Federal Rules of Evidence, does hereby declare and say:

1. My name is William S. Cooper. I have a B.A. degree in Economics from Davidson College. As a private consultant, I currently serve as a demographic expert for the Plaintiffs.

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 40 voting rights cases in 16 states. My testimony in these lawsuits almost always included a review of demographics and socioeconomic characteristics for the jurisdictions at issue.

3. The attorneys for the plaintiffs asked me to review measures of socioeconomic status for African Americans and non-Hispanic Whites in South Carolina, as reported in the *1-Year 2018 American Community Survey* (2018 ACS) published by the U.S. Census Bureau.

4. According to the 2018 ACS, the citizen voting age population in South Carolina is 3,850,077, of whom 1,021,072 are single-race African-American (25.5%), 115,494 are Latino (3.0%), and 2,605,101 (67.7%) are non-Hispanic White.¹

5. According to the 2018 ACS, the 2018 voting age population of South Carolina is 3,979,718, of whom 25.7% are non-Hispanic African-American, 4.8% are Latino, and 66.1% are non-Hispanic White.² (See **Attachment B at p. 1**)

¹ Source: **Table S2901 -- CITIZEN, VOTING-AGE POPULATION BY SELECTED CHARACTERISTICS**

<https://data.census.gov/cedsci/table?q=south%20carolina%20voting%20age%20population&g=0400000US45&tid=ACSSST1Y2018.S2901&t=Age%20and%20Sex&vintage=2018>

² Source: **Table S0201 – SELECTED POPULATION PROFILE**

As of April 21, 2020, the PDF version of Table S0201 is not yet available from the Census Bureau's new website which replaced American Factfinder. Right click on any cell in the webpage source below to download an Excel compatible version of the S0201 dataset.

<https://data.census.gov/cedsci/table?q=s0201&tid=ACSSPP1Y2018.S0201&y=2018&t=400%20-%20Hispanic%20or%20Latino%20%28of%20any%20race%29%20%28200-299%29%3A451%20-%20White%20alone,%20not%20Hispanic%20or%20Latino%3A453%20-%20Black%20or%20African%20American%20alone,%20not%20Hispanic%20or%20Latino%3ARace%20and%20Ethnicity&hidePreview=true&moe=false&g=0400000US45>

6. For the 3.98 million South Carolinians of voting age, 558,826 (14.5%) live alone. Of the 899,754 persons who are 65 and over³, 222,484 (24.7%) live alone.⁴ Thus, about 39.8% of persons who live alone are over 65.

7. For South Carolinians of voting age living alone, 26.6% (148,897) are disabled.⁵ And for the subset of 65 and over living alone, 39.2% (88,940) are disabled.

8. For the 1.02 million African Americans of voting age, 170,075 (16.7%) live alone.⁶ Of the 162,697 African Americans who are 65 and over, 53,591 (32.9%) live alone.

³ Source: **Table S0101 -- AGE AND SEX**

<https://data.census.gov/cedsci/table?q=population%20by%20age&g=0400000US45&tid=ACSS1Y2018.S0101&t=Age%20and%20Sex>

⁴ Source: **Table DP02 -- SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES**

https://data.census.gov/cedsci/table?q=south%20carolina%20single%20person%20households&g=040000US45&hidePreview=false&tid=ACSDP1Y2018.DP02&vintage=2018&layer=VT_2018_040_00_PY_D1&cid=DP02_0001E

⁵ Source: **ACS 1-Year Estimates - Public Use Microdata Sample (2018)**

[https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2018&vv=AGEP\(18:99\)&cv=RACBLK,DIS&rv=ucgid&nv=HHT\(4,6\)&wt=PWGTP&g=0400000US45](https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2018&vv=AGEP(18:99)&cv=RACBLK,DIS&rv=ucgid&nv=HHT(4,6)&wt=PWGTP&g=0400000US45)

⁶ Source: **ACS 1-Year Estimates - Public Use Microdata Sample (2018)**

[https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2018&vv=AGEP\(18:99\)&cv=RACBLK&rv=ucgid&nv=HHT\(4,6\)&wt=PWGTP&g=0400000US45](https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2018&vv=AGEP(18:99)&cv=RACBLK&rv=ucgid&nv=HHT(4,6)&wt=PWGTP&g=0400000US45)

9. In South Carolina, for voting age African Americans (incl. Hispanic Black) living alone, 27.1% (46,066) are disabled.⁷ For the subset of 65 and over living alone, 41.2% of African Americans (22,092) are disabled. For voting age Whites (incl. Hispanic White) living alone, 26.7% (101,164) are disabled.⁸ For the subset of 65 and over living alone, 38.6% of Whites (64,389) are disabled.

10. In South Carolina, African Americans and Latinos trail non-Hispanic Whites across most key indicators of socioeconomic well-being. This disparity is summarized in the charts in **Attachment A** and the table in **Attachment B**, as reported in Table S0201 from the 2018 ACS.

11. The following items specifically compare single race non-Hispanic African Americans and non-Hispanic Whites, according to the 2018 ACS:

a) Income

- About a quarter (25.4%) of African Americans in South Carolina live in poverty, compared to 10.0% of Whites. (**Attach. A at p. 22 and Attach. B at p. 7**)
- Nearly two in five (38.7%) of African-American children live in poverty, compared to 11.4% of White children. (**Attach. A at p. 22 and Attach. B at p. 7**)

⁷ Source: **ACS 1-Year Estimates - Public Use Microdata Sample (2018)**

[https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2018&vv=AGEP\(18:99\)&cv=RACBLK,DIS&rv=ucgid&nv=HHT\(4,6\)&wt=PWGTP&g=0400000US45](https://data.census.gov/mdat/#/search?ds=ACSPUMS1Y2018&vv=AGEP(18:99)&cv=RACBLK,DIS&rv=ucgid&nv=HHT(4,6)&wt=PWGTP&g=0400000US45)

⁸ Source: **ACS 1-Year Estimates - Public Use Microdata Sample (2018)**

- About two in five (43.1%) of African American female-headed households with children live below poverty, compared to a 33.0% poverty rate for White female-headed households. (**Attach. A at p. 20 and Attach. at p. 7**)
- African-American median household income is \$34,594, compared \$61,600 for White households. (**Attach. A at p. 14 and Attach. B at p. 6**)
- Per capita income disparities in South Carolina track the disparities seen in median household income. African-American per capita income is \$18,982, compared to White per capita income of \$34,663. (**Attach. A at p. 17 and Attach. B at p. 7**)
- About a quarter (24.2%) of African-American households rely on food stamps (SNAP) –nearly four times the 6.6% SNAP participation rate of White households. (**Attach. A at p. 15 and Attach. B at p. 6**)

(b) Education

- Of persons 25 years of age and over, nearly one-sixth (16.1%) of African Americans have not finished high school, compared to 8.7% of their White counterparts. (**Attach. A at p. 5 and Attach. B at p. 3**)
- At the other end of the educational scale, for ages 25 and over, 15.3% of African Americans have a bachelor's degree or higher, compared to 33.4% of Whites. (**Attach. A at p. 5 and Attach. B at p. 3**)

(c) Employment

- The Black unemployment rate (for the population over 16 (expressed as a percent of the civilian labor force) is 8.0% – compared to a 4.1% White unemployment rate. (**Attach. A at p. 11 and Attach. B at p. 5**)
- Of employed African Americans, 23.1% are in management or professional occupations, compared to the 39.9% rate of Whites. (**Attach. A at p. 13 and Attach. B at p. 5**)

(d) Household Composition

- Of all African American households, 33.2% contain persons living alone. Of all White households, 28.2% contain persons living alone. (**Attach. A at p. 28 and Attach. B. at p. 2**) ⁹
- Of all African American households, 14.8% are female-headed, with children under 18. By comparison, 3.9% of White households are female-headed with children. (**Attach. A at p. 29 and Attach. B at p. 2**)

(e) Home ownership

- About half of African-American householders (51.4%) are homeowners, while more than three-fourths of White households (77.5%) are owner-occupied. (**Attach. A at p. 21 and Attach. B at p. 8**)
- Median home value for African-American homeowners is \$106,700, compared to the \$189,800 median home value for Whites. (**Attach. A at p. 25 and Attach. B at p. 9**)

(f) Health

- Nearly two in five African Americans (38.6%) aged 65 and over have a disability, compared to 33.1% of their White cohorts. (**Attach. A at p. 7 and Attach. B at p. 4**)
- About one in nine African Americans (11.6%) has no health insurance coverage, compared to 8.3% of Whites. (**Attach. A at p. 18 and Attach. B at p. 7**)

⁹ As noted in ¶8 supra, at the individual-level, 16.7% of African Americans of voting age live alone and 32.9% of those 65 and over live alone.

(g) Transportation/Communication

- About one in eight African-American households (13.6%) lacks access to a vehicle, while 3.5% of White households are without a vehicle. (**Attach. A at p. 23 and Attach. B at p. 8**)
- There is an 8-point Black-White gap in households with a computer, smartphone, or tablet – 84.7% versus 92.0%. (**Attach. A and Attach B. at p. 9**)
- More than one fourth (28.3%) of African American households do not have a broadband internet connection, compared to 14.9% of White households. (**Attach. A at p. 27 and Attach. B at p. 9**)

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Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct according to the best of my knowledge, information and belief.

Executed on: **April 27, 2020**


WILLIAM S. COOPER